

1 remember the next series of events.

2 Q Well, looking at page -- or the first page, the  
3 reference after No. 2, now, we know from our -- from prior  
4 testimony that you were very aware that you had reached the  
5 maximum. Had you imparted this knowledge to anyone else on  
6 your staff or were -- was it just you and Colby May who knew  
7 about this?

8 A I think all of us were generally aware that we had  
9 reached the maximum because in my newsletters and other  
10 communications it was quite an event when Dallas signed on the  
11 air and that was Station No. 12.

12 Q Do you recall having any conversations with Colby  
13 May about the drafting of the paragraph 7A that is referenced  
14 in this letter after No. 2?

15 A I believe it was Mr. May's suggestion to us that  
16 this might be a way for myself to be involved in an additional  
17 full-power station ownership.

18 Q Do you recall there being any discussion with Mr.  
19 May as to not only the board membership of Translator TV, Inc.  
20 but what Translator TV, Inc.'s prior history was in terms of,  
21 and I go through a list of things -- attendance at Trinity  
22 board meetings, did you discuss that with Mr. May at all?

23 A Whose attendance at --

24 Q Translator TV Inc.'s attendance at Trinity board  
25 meetings.

1           A     I'm confident Mr. May was certainly aware of  
2 Translator TV's board --

3           Q     Well, okay, let's make sure we're on the same wave  
4 length here. What I'm asking now is whether you recall any  
5 conversations, any discussions with Colby May about the  
6 interrelations between Translator TV, Inc. and TBN and one  
7 aspect of that would be Translator TV Inc.'s attendance at the  
8 joint annual board meetings of TBN and related companies.

9           A     I can't put my finger on a specific discussion but,  
10 you know, there were probably many discussions with Mr. May  
11 through the years of the relationship between National  
12 Minority and Trinity Broadcasting.

13          Q     Well, it that helps you remember that's one thing,  
14 but I'm trying to focus you on a particular period of time  
15 which right now we're in December of 1986. There is a  
16 paragraph that is being drafted in an asset purchase agreement  
17 that deals specifically with the situation of you having an  
18 interest in twelve stations and this is going to be Station  
19 No. 13 but that there's something different about this station  
20 which would allow you to acquire interest. What I'm exploring  
21 with you is any conversation or conversations that you had  
22 with Mr. May in terms of how to put this paragraph together  
23 and whether it was even proper to put it together.

24          A     The best I can remember, Mr. Shook, is that Mr. May  
25 explained to us that National Minority, in his opinion, fit

1 the exception of the rule of twelve.

2 Q All right, and what I'm trying to explore with you  
3 and I recognize that it's seven years ago, what factors, if  
4 any, did you and Mr. May discuss in order for Mr. May to come  
5 to the conclusion that what you ultimately did was proper?

6 A The simple fact that the majority of Translator TV's  
7 board were minorities and that that, I think, among other  
8 things qualified it for this exception of the rule of twelve.

9 Q Was there any exploration between yourself and Mr.  
10 May as to what the persons who were minority members on the  
11 board actually did relative to Translator TV, Inc., did that  
12 come up at all or was it simply that they were -- that they  
13 existed and that they were minorities?

14 A I don't recall any discussions with Mr. May as to  
15 what their specific function or duties were other than being  
16 board members.

17 Q So you don't recall exploring with him, as I said  
18 first of all, attendance at joint meetings involving Trinity  
19 and related companies.

20 A Well, since Mr. May attended most of those joint  
21 meetings himself and knew very well that the National Minority  
22 or TTI board was included in those meetings, I don't guess I  
23 ever realized that it would have been necessary to have such a  
24 discussion.

25 Q Yeah -- no, I'm not -- it's just -- let's make sure

1 we're together here. What I'm asking you is whether you  
2 recall any specific conversation and I'm drawing from your  
3 answer apparently you did not have a specific conversation  
4 with Mr. May relative to Translator TV Inc.'s appearance or  
5 attendance at joint annual board meetings of Trinity and its  
6 affiliated companies, as to whether that was a factor that  
7 weighed in his assessment.

8 A I recall no such discussion with regard to this  
9 particular transaction.

10 Q Do you recall there being any conversation or any  
11 discussion with Colby May about the fact that Trinity  
12 Broadcasting Network had the books, such as they existed, of  
13 Translator TV, Inc. and by books, I mean the financial  
14 records.

15 A Um-hum. No, I recall no such conversation.

16 Q Do you recall any conversation with Colby May about  
17 the preparation of applications that had been made on behalf  
18 of Translator TV, Inc. and the fact that the same consulting  
19 engineers were utilized by both Translator TV, Inc. and TBN?

20 A No, sir, I recall no such conversation.

21 Q So the only thing that you can recall being  
22 considered by Mr. May -- and you would conclude that because  
23 of your conversations with him, that the only thing that he  
24 considered was that Translator TV, Inc. was apparently still  
25 in good standing in the state of California as a corporation,

1 that it had a board of three members and that two of those  
2 members were minorities.

3 A Yes, sir, I simply recall that Mr. May's opinion was  
4 that TTI met the threshold criteria of the Commission for the  
5 exception of the rule of twelve. I do remember telling Mr.  
6 May to move on with this possibility with Mrs. Duff. I  
7 basically turned the project over to them at that time but I d  
8 recall one thing, I told Mr. May very explicitly, I said, if  
9 we go for this and he did make it clear to me that I believed  
10 we were the very first applicant to approach the Commission  
11 for this exception. And I said, we're plowing new ground, new  
12 territory here and I said, put everything on the record, make  
13 it clear to the agency what the relationship between TTI and  
14 Trinity Broadcasting is, divulge everything, put everything on  
15 the record, file it with the Commission. If they pass on it  
16 and approve it, fine, our goal was to acquire as many stations  
17 and network affiliates as we possibly could.

18 Q Now, this was in a telephone conversation that you  
19 had with Mr. May that you recall giving him this instruction?

20 A It very -- probably was, yes.

21 Q Recognizing that you're located generally in  
22 California and that he's in Washington, D.C.

23 A Yes, most of my conversations with Mr. May were over  
24 the telephone so I truly believed this one was.

25 Q And that what you just testified to, that took place

1 on or about the time of this letter?

2 A Yes, sir.

3 Q Did Mr. May then represent to you in response to  
4 that instruction that he would divulge or make known to the  
5 Commission everything relative to the relationship that  
6 existed between Translator TV, Inc. and Trinity Broadcasting  
7 Network?

8 A I certainly believe he did.

9 Q You don't recall that he did but you believe it.

10 A I believe it.

11 Q But you don't recall it.

12 A I don't recall specific language, Mr. Shook, but I  
13 am certain that he concurred with my instruction that that  
14 should be done.

15 Q Now, I'd like you to turn to Mass Media Exhibit 120.

16 A Yes, sir.

17 Q Now, again I recognize that this is a letter that  
18 was not prepared by yourself and according to what appears on  
19 the letter, it was not copies to you either. So with that in  
20 mind, if you could just read through it briefly.

21 A Yes, I see this letter, I've read it.

22 Q So the tenor of this letter would be consistent with  
23 your understanding that you had turned the Odessa project over  
24 to Mrs. Duff to work up, if you will?

25 A Yes, sir.

1           Q     Now, in terms of her signing this letter as  
2 assistant to the president, would a letter -- would it be the  
3 normal practice for a letter that was signed in the capacity  
4 of assistant to the president, would it be normal or would it  
5 be the customary practice for that letter to be reviewed or  
6 sent by yourself prior to its sending out?

7           A     Not necessarily.

8           Q     In some instances yes and in some instances no.

9           A     I think that's a fair statement, yes.

10          Q     Now, do you have any recollection of this letter  
11 having been sent on or about December 29, 1986?

12          A     No, sir.

13          Q     Do you have any explanation as to why Jane Duff  
14 signed this letter as assistant to the president as opposed to  
15 in some capacity related to Translator TV, Inc.?

16          A     She was simply signing her title in relationship to  
17 me but why she signed it in that way, I do not know.

18          Q     Please turn to Mass Media Exhibit 21 -- or 121,  
19 excuse me.

20          A     Yes, sir.

21          Q     The last full paragraph on the bottom of page 1, the  
22 references to LaSalle, Chicago and Bartlesville/Tulsa, those  
23 are stations which are not owned and operated, correct?

24          A     Those are All American television stations, yes,  
25 sir.

1 Q Turning again to the listing that appears on page 3,  
2 listing of studios down at the bottom there?

3 A Yes, sir.

4 Q Again we have Alabama/Birmingham noted as an  
5 affiliated station and the rest are not. Do you see that?

6 A Yes, sir.

7 Q But in -- as far as you were concerned, Beaumont and  
8 Harlingen which appear in Column 4 were not owned and operated  
9 stations, unlike all the others that are listed there with the  
10 exception of Alabama/Birmingham?

11 A I think earlier we agreed that commonality of board  
12 members and particularly those with a majority of the Trinity  
13 board on them in one sense albeit another class of station,  
14 can be considered as owned and operated stations.

15 Q Well, the only reason I persist in asking the  
16 question when it comes to each of these documents is that, you  
17 know, this is a Trinity document and we have established early  
18 on that each of these newsletters would more likely than not  
19 have been reviewed by yourself prior to their being sent.

20 A They would have, Mr. Shook, but please let me  
21 reiterate that the purpose of this listing was not to convey  
22 any particular ownership or lack of ownership in the stations,  
23 it was a simple directory for the convenience of the viewers  
24 to find their local hometown studios. I think in an abundance  
25 of caution we added the asterisk to Alabama/Birmingham simply



1 to try to distinguish it as a station that had absolutely no  
2 commonality of board members.

3 Q Well, that would be your understanding as to why  
4 that was the case, you don't recall any specific directive one  
5 way or the other on that subject.

6 A No, I don't recall any specific directive.

7 Q I mean, I think you understand that what I'm trying  
8 to determine here is whether this listing and the various  
9 distinguishing characteristics that are noted occurred by  
10 chance or whether there was some thought put into it and if  
11 so, who put that thought there?

12 A While I can't put my finger on a specific incident,  
13 I'm sure my thought went into distinguishing Alabama, for  
14 example, as a affiliated station with an asterisk to  
15 distinguish it from any of the other stations that did have a  
16 commonality of board members.

17 Q All right, let's turn to Mass Media Exhibit 122.

18 A Yes, sir, I'm there.

19 Q Now, if you will, turn to page 16.

20 A Yes, sir.

21 Q And I recognize from this that your signature does  
22 not appear here.

23 A Correct.

24 Q My question is, you were aware though that the  
25 document had, in fact, been executed by Mr. Duff -- or Mrs.

1 Duff, rather, and that is so occurred at your direction?

2 A I became generally aware that an agreement had been  
3 executed, yes, sir.

4 Q Were you not specifically aware in the sense that  
5 didn't you instruct Mrs. Duff that, yes, you can sign this or  
6 did you just leave it to her discretion as to whether or not  
7 she could sign it?

8 A I think it was just generally understood that the  
9 board of National Minority, or TTI in this case, had  
10 authorized the purchase of it and I simply left it to Mrs.  
11 Duff and Mr. May to work out the details of the contract and I  
12 do not recall any specific instruction one way or the other, I  
13 left it to Mrs. Duff and Mr. May to work out the details.

14 Q When you made reference to the board, am I to  
15 presume from that that you meant that there was some specific  
16 board meeting or board conversations relative to the execution  
17 of this document because I can tell you and you know from --  
18 or having gone through the various documents that we have come  
19 upon no such board minutes.

20 A Well, it was my understanding that the board of  
21 directors of National Minority, in the case TTI, were well  
22 aware Mrs. Duff was handling this transaction. As I said, I  
23 turned it over completely to her and Mr. May to work out the  
24 details with Mr. Roever and all I can recall, sir, is being  
25 generally aware that in due course a purchase agreement had

1 | been executed.

2 |       Q     Had you seen a copy of the purchase agreement prior  
3 | to the time that it was executed?

4 |       A     I may have but I honestly don't have any independent  
5 | recollection of having reviewed the document before it was  
6 | executed.

7 |       Q     Were you involved in any way in the negotiation of  
8 | the purchase agreement with Mr. Roever?

9 |       A     I recall no such involvement.

10 |       Q     I'd like to direct your attention to page 2,  
11 | paragraph 2, subpart "A".

12 |       A     Of this contract?

13 |       Q     Yes, sir.

14 |       A     Page 2.

15 |       Q     Paragraph 2, subpart "A".

16 |       A     Okay, I am there.

17 |       Q     Do you see the figure \$12,500?

18 |       A     Yes.

19 |       Q     Did you have any awareness of what Translator TV,  
20 | Inc. was obligating itself for in respect to the obtaining of  
21 | the permit for Odessa?

22 |       A     My only recollection there, Mr. Shook, is again, in  
23 | the earliest conversation I had with Mr. Dave Roever, the  
24 | brother of Al Roever and I do recall asking him, you know,  
25 | what do you have invested in the construction permit and I

1 vaguely remember something in the neighborhood of \$12,000 as  
2 being that amount which, in my opinion, was a fairly nominal  
3 sum for acquiring a construction permit for a full-power TV  
4 station.

5 Q Now, with respect to the acquisition of a station  
6 such as a full-power television station in Odessa, from the  
7 time you became aware that such a permit was available, had  
8 you personally undertaken any market study of the Odessa  
9 market to determine what this station was going to do in the  
10 event you got it?

11 A No, sir.

12 Q I'd like you to turn pages 7 and 8, paragraph 7,  
13 subpart "A".

14 A Yes, sir, I'm there.

15 Q And if you would just read through that to yourself.

16 A Yes, sir, I've read that paragraph.

17 Q Now you may recall in respect to the letter that we  
18 looked at just a couple of exhibits back, that there was  
19 reference to a paragraph 7A.

20 A Yes.

21 Q And this is the paragraph in question. Had you read  
22 this paragraph prior to the time the document was executed by  
23 Mrs. Duff?

24 A No, sir.

25 Q Had you -- other than the discussion that we've

1 already had in the testimony that you've given relative to  
2 conversations with Mr. May, did you have any other  
3 conversation with Mr. May in terms of how this paragraph  
4 should be drafted and what it was to mean?

5 A No, sir.

6 Q Now, I'd like to direct your attention to Mass  
7 Media Exhibit 123.

8 A Yes, sir, I'm there.

9 Q You will note that the services rendered covers a  
10 period December 15, 1986 through January 9, 1987, do you see  
11 that?

12 A Yes, sir.

13 Q And that you can review this bill but I see  
14 absolutely no reference to Translator TV, Inc.

15 A I see that.

16 Q Now, we've gone over several exhibits which took  
17 place during the time frame noted here. Do you have any  
18 explanation, do you have any knowledge as to why there is no  
19 reference here for Translator TV, Inc.?

20 A No, sir, I do not.

21 Q Now, I'd like you to turn to Mass Media Exhibit 124.

22 A Yes, sir, I'm there.

23 Q Now, at this point in time, just so you can orient  
24 yourself, you look at the first paragraph, this meeting took  
25 place on January 19, 1987. You see that?

1 A Yes, sir.

2 Q Which is some nine days after the asset purchase  
3 agreement for Odessa was signed.

4 A Yes, sir.

5 Q And if you look in the listing of companies  
6 attending this meeting, we still have Translator TV, Inc.  
7 here.

8 A Yes, sir.

9 Q Do you have any explanation as to why Translator TV,  
10 Inc. is in attendance at this annual meeting of the combined  
11 boards?

12 A Well, that was just our practice to have Trinity  
13 Broadcasting Network and as you'll see in the heading here,  
14 "and affiliate corporations" attend at least one annual  
15 combined board meeting.

16 Q Now, I also notice in the second paragraph that for  
17 those present it includes Colby May. Do you see that?

18 A Yes.

19 Q Do you recall Mr. May's attendance at this meeting?

20 A I recall his attendance at several of the meetings,  
21 it would be hard to distinguish which one he was at and which  
22 one he was not but obviously he was here at this one.

23 Q Do you recall discussing with Mr. May in the context  
24 of this meeting whether or not it was appropriate for  
25 Translator TV, Inc. to be attending the combined meeting of

1 | Trinity Broadcasting Network and affiliated corporations?

2 |       A     I don't know if it was at this particular meeting or  
3 | not, Mr. Shook, but I do recall a time when Mr. May advised  
4 | the board of Translator TV, Inc. that since it was now  
5 | apparent that TTI may become the licensee of a -- its first  
6 | broadcast property, that it was basically coming of age and  
7 | that we should be thinking of TTI, later NMTV, differently and  
8 | that Translator TV should -- while welcome to attend the  
9 | combined meetings should, in addition, adjourn and have its  
10 | own separate board of directors meetings.

11 |       Q     Now, Reverend Crouch, if you could look through the  
12 | nine pages that are noted here and before you do that, let me  
13 | explain to you why I'm stating it this way. You could look  
14 | through the nine pages of this document and I have seen  
15 | absolutely no reference to Translator TV, Inc. having signed a  
16 | purchase agreement to acquire its first television station  
17 | which, by all accounts, would have been the most significant  
18 | event in the life of that corporation to date. Now, with that  
19 | in mind, do you have any explanation as to why the signing of  
20 | the asset purchase agreement was not noted?

21 |       A     I certainly believe in the meeting I made that  
22 | announcement that would have been, as you say, some  
23 | significant new news. Why it's not recorded or memorialized  
24 | in these minutes here, I cannot tell you, I didn't prepare  
25 | them. I can only observe that this very well may have been

1 the time that Mr. May advised us that it was time for National  
2 Minority to begin thinking of itself a little bit differently  
3 and begin having its own separate independent board meetings,  
4 even in the context of the one annual combined board meeting.

5 Q I'd like you to direct your attention to page 6, the  
6 second to the last paragraph and you just read that to  
7 yourself, where it says "the board of Trinity Broadcasting  
8 Network, Inc. then considered a budget", do you see that?

9 A Yes, sir. Yes, sir, I've read that paragraph.

10 Q Now, I see that Trinity Broadcasting Network is  
11 considering a budget for the acquisition of low-powered  
12 stations.

13 A Yes, sir.

14 Q Can you give me an explanation as to why Translator  
15 TV, Inc. is not giving consideration for a budget or  
16 considering a budget for the acquisition of low-powered  
17 stations whereas nine days earlier it's now signed a contract  
18 to acquire a full-power station which is something that it had  
19 never considered previously and the whole purpose of  
20 Translator TV, Inc. was to be involved in Translator stations?

21 A I can only give you the same answer I've given  
22 earlier, Translator's original purpose was to simply file for  
23 low-powered TV stations claiming the minority exception, as  
24 we've discussed at length. Looking back now, I have a feeling  
25 both of the boards felt like this was a fairly major new



1 concept and project for TTI and that was enough for it to  
2 become involved in at this time. I -- that would certainly be  
3 my feeling if I were looking at this for the first time right  
4 now.

5 Q Would it be fair to state though that the only  
6 reason that Translator TV, Inc. is filing or is going to file  
7 an application to acquire a full-power television station but  
8 is not going to make any efforts whatsoever to acquire  
9 available low-power stations is simply the availability of a  
10 preference which could be accorded the one act, that is, the  
11 acquisition of a full-power station but that there would be no  
12 preference given relative to the acquisition of low-power  
13 stations?

14 A There is no question the purpose for this change in  
15 direction for TTI was to pass by the agency the possibility of  
16 being granted the exception to the rule of twelve. That is  
17 without question.

18 Q And sir, what baffles me and I'll, you know, try to  
19 put this as plainly as I can, is for the life of me I cannot  
20 understand why a company like Translator TV, Inc., which had  
21 been organized in 1980 for the purpose of acquiring translator  
22 stations in as many markets as possible in order to spread the  
23 gospel would not also be involved in the acquisition of low-  
24 power stations now in 1987, it just baffles me.

25 A But it had filed for some low-power authorizations.

1           Q     All right, and the only point that I'm making and I  
2 guess you've answered it is that we now have low-power permits  
3 that are available for the taking and yet Translator TV, Inc.  
4 is not going to be involved in that and that's what these  
5 minutes tell me, is that what was going on?

6           A     Yes, absolutely. Again I say that the original  
7 purpose of TTI was for it to basically file for, it was a  
8 minority dominated and controlled and basically owned  
9 organization and its purpose was to file for and be granted  
10 construction permits taking advantage of the Commission's  
11 policy to grant minority preference to such organizations and  
12 that is precisely what it did.

13               MR. SHOOK: Your Honor, may we go off the record for  
14 one minute?

15               JUDGE CHACHKIN: Yes.

16               (Off the record at 12:16 p.m. Back on the record at  
17 12:17 p.m.)

18               JUDGE CHACHKIN: All right.

19               BY MR. SHOOK:

20           A     Mr. Shook, may I add one additional word to what I  
21 just said?

22           Q     Yes, sir.

23           A     It occurs to me as I think about this that there was  
24 even an additional consideration here. If National Minority  
25 had been funded by Trinity Broadcasting Network as it would

1 have had to have been to acquire these existing CP's as you  
2 stated, there would have been less of advantage to Trinity  
3 Broadcasting because not only would Trinity have had to loan  
4 us the funds to acquire these permits and build them, once  
5 they were built, Trinity would only receive 20 per cent of the  
6 income from those areas and those markets. TTI would have  
7 received 80 per cent of that amount. So as a business  
8 decision, also now that I recall it and think about it, it was  
9 my desire to see TTI take advantage of the minority preference  
10 and expand in that way whereas as far as acquiring CP's  
11 already in existence, Trinity could easily do that since there  
12 was no preference of one kind or another involved. So it was  
13 partially a business decision, sir.

14 Q Well, with what you just said it seems to me to  
15 place you in a very difficult position because you are  
16 president of both, Trinity Broadcasting Network as well as  
17 Translator TV, Inc. and from the tenor of what you've just  
18 told me, it seems to me that the business decision made to  
19 have TBN acquire low-power stations but not to have Translator  
20 TV, Inc. acquire low-power stations was one driven by you  
21 wearing your TBN hat, to use an expression, and that if there  
22 ever came a time when there was a conflict and apparently this  
23 was a conflict situation between TBN and Translator TV, Inc.,  
24 that there was no question as to which side of the line you  
25 were going to come down on.

1           A     Well, sir, that may be the case, that was simply,  
2 now that I think about it, a business -- conscious business  
3 decision on my part thinking that if and when TTI is granted  
4 the minority preference authorizations we will move forward  
5 and build them just as we had originally conceived the  
6 purposes for TTI to be.

7           Q     Now, a difficulty that flows from your explanation,  
8 I mean the difficulty is mine, I will explain it to you, is  
9 that there are three members of the board of Translator TV,  
10 Inc. and yet there is nothing in these minutes to reflect that  
11 the other two members, both of whom are here at this meeting,  
12 are giving any thought or have -- there has been any  
13 discussion about Translator TV, Inc. stepping in and taking  
14 over the permits. Was there no such discussion?

15          A     Well, sir, I don't know of there was or not,  
16 obviously not every word or every discussion gets perfectly  
17 memorialized in a set of minutes. As I said, I didn't author  
18 these minutes or put them together so I just don't know, I  
19 can't answer that question. I'm beginning to believe that  
20 there was a completely separate meeting of the board of  
21 Translator TV, if not at this particular occasion, certainly  
22 at some subsequent occasion because I distinctly remember our  
23 adjourning to a different place over lunch and have a TTI  
24 meeting in the context of the overall network affiliates  
25 meeting.

1 Q But you don't have any specific recollection of such  
2 a meeting having taken place in 1987 at the combined meeting,  
3 do you?

4 A I can't definitively pin it to this year or this  
5 meeting.

6 Q Okay, do you have any recollection as to which year  
7 that this process of separately adjourning actually took  
8 place?

9 A No, sir, but it would seem to me that there would be  
10 existing minutes that would reflect that.

11 Q I'd like you to turn to page 9.

12 A Yes, sir, I'm there.

13 Q There is a reference in the middle of the page to "a  
14 telethon was recently conducted in Harlingen with a satellite  
15 feed to Beaumont also", etc. Do you see that?

16 A Yes.

17 Q Now, Harlingen, Beaumont and then Houston, which is  
18 also referenced here, all of these are related to Community  
19 Educational Television, correct?

20 A Yes.

21 Q What is the telethon that's being referenced here,  
22 is this a TBN telethon or is this something else?

23 A No, we were advised by counsel that the non-  
24 commercial stations would have to conduct their own  
25 independent telethons separately from the TBN telethons. This

1 | apparently is some unique agency rule.

2 |           (Off the record. Back on the record.)

3 |       Q     So the reference to the telethon here is a CET  
4 | telethon, not a TBN telethon.

5 |       A     Correct.

6 |       Q     Dr. Crouch, I'd like you to return to Mass Media  
7 | Exhibit 126.

8 |       A     Yes, sir, I'm there.

9 |       Q     Now, again I recognize that this letter was not  
10 | signed by you and there's no indication on it that you  
11 | received a copy. However, do you recall reviewing this letter  
12 | and the accompanying application for consent to assignment  
13 | prior to its being transmitted to Colby May?

14 |       A     No, sir, I have no such recollection.

15 |       Q     Do you have any explanation -- again, recognizing  
16 | that this is not your letter, but do you have any rec--  
17 | explanation as to why Jane Duff is transmitting the Translator  
18 | TV, Inc. application to acquire Odessa as assistant to the  
19 | president?

20 |       A     This is the first time that I recall even focusing  
21 | on this letter. As I review it now, that probably is a  
22 | mistake, that should have been transmitted on National  
23 | Minority letterhead.

24 |       Q     No, I'm -- what I'm asking you is do you know why  
25 | this occurred and if you don't know that's fine, I mean,

1 instead of probably or you believe or whatever, I'm asking you  
2 if you know.

3 A No, I do not.

4 Q Could you turn to Mass Media Exhibit 127.

5 A Yes, sir.

6 Q Now, what I'd like you to focus on here is on page  
7 4.

8 A Yes, sir.

9 Q You see the various listings that are here, the  
10 first listing we have is TBN station listing and then  
11 underneath it it says "TBN Owned and Operated Full-Power  
12 Stations"?

13 A Yes, sir.

14 Q Do you note the stations that are included there,  
15 that include CET stations, do you see that?

16 A Yes, it does.

17 Q Do you have any explanation as to why CET stations  
18 are listed here as TBN owned and operated full-power stations?

19 A I think we covered that earlier, Mr. Shook, in a  
20 similar listing which simply, as I've stated so often,  
21 represents a commonality of board members and in this case,  
22 probably a majority of the TBN board members being a majority  
23 of the board of the CET organization.

24 Q Do you have any recollection of being involved in  
25 the, for lack of a better word at this point, putting together

1 the information here?

2 A No, sir, I would not have been involved in the  
3 composition of this information.

4 Q Thank you for that word. Do you have -- it would  
5 have been your practice, tough, to have reviewed the  
6 newsletter prior to its being sent out.

7 A Typically I would have, yes, sir.

8 Q Now, you also see that this newsletter does  
9 distinguish between TBN owned and operated full-power stations  
10 and if you look down toward the bottom of the page at the  
11 right, there's a designation "TBN Full-Power" and then in  
12 parentheses it reads "Affiliate Stations".

13 A Yes.

14 Q You see that?

15 A Yes, sir.

16 Q How, there's a listing of somewhere around ten to  
17 twelve, I didn't count them but these are all stations the  
18 licensees of which have no commonality in the board members  
19 between themselves and TBN?

20 A Yes, sir, that is the case.

21 Q Now, I missed something here. I'd like you to turn  
22 back to Mass Media Exhibit 125. Now, you'll notice that  
23 Terrence Hickey is signing this document on page 1 as well as  
24 on page 2, page 2 is a photocopy of page 1 with one additional  
25 signature added which we'll get to in a little bit.



1           A     Um-hum.

2           Q     But in terms of Terrence Hickey signing here, when  
3 you look at the first paragraph, the first paragraph reads  
4 "the undersigned being all the directors", etc. Do you see  
5 that?

6           A     Yes.

7           Q     And then you get underneath and there's a signature  
8 here for Terrence Hickey, albeit designated as assistant  
9 secretary.

10          A     Yes.

11          Q     Did you have any role in the preparation of this  
12 document?

13          A     No, sir.

14          Q     Do you know who did?

15          A     No, sir.

16          Q     Do you have any explanation as to why Terrence  
17 Hickey is signing this document?

18          A     I think he perceived himself to be the assistant  
19 secretary as he was the assistant secretary for a wide range  
20 of other TBN stations and affiliated stations but I've come to  
21 understand that in this instance he was not. Let me point out  
22 something though that --

23          Q     He was not what?

24          A     He was not a director nor an officer, I don't  
25 believe.